
YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Court, Suite 103, Davis, CA 95616
(530) 757-3650

TITLE V OPERATING PERMIT
Permit Number: F-00254-5

ISSUED TO:

Truck Accessories Group LLC
dba Leer West
1686 East Beamer Street
Woodland, CA 95776

PLANT SITE LOCATION:

1686 East Beamer Street
Woodland, CA 95776

ISSUED BY:

Mat Ehrhardt, P.E., Air Pollution Control Officer

Date

PROPOSED November 16, 2010

EFFECTIVE PROPOSED

EXPIRATION PROPOSED

Nature of Business:
SIC Code:

Truck cap manufacturer
3792

Responsible Official:

Name: Jesus Bonilla
Title: General Manager
Phone: (530) 666-0176

Site Contact Person:

Name: Gus Gonzales
Title: Environmental Health and Safety
Manager
Phone: (530) 666-0176

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I. FACILITY EMISSION UNITS AND EQUIPMENT LISTS

A. Insignificant Emissions Units

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided exemption status has not changed as defined in current district or federal rules. The equipment listed in Table 1 is a partial listing of equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to Rule 3.2 of the Yolo-Solano Air Quality Management District.

Table 1. Exempted And Insignificant Emissions Units (partial listing)

Insignificant Equipment Description	Basis for Exemption
Fork Lifts	District Rule 3.2, Section 101.1
Office Air Conditioning System	District Rule 3.2, Section 103
Natural Gas Heaters < 1 MMBtu/hr	District Rule 3.2, Section 105.2
Repair and Maintenance Operations	District Rule 3.2, Section 108

B. Significant Emissions Unit Information

Each of the sources has been constructed pursuant to issuance of an authority to construct in accordance with District Rules 3.1 and 3.4.

Identification Number: P-104-91(a2), Gel Coat and Lamination Processes

Equipment Description: Gel coat: Viking spray booth, Model #TDA 16-14-9, 14'W x 9'H x 52'D; various non-atomizing spray guns
Lamination: Two-sided Viking spray booth, 14.5'W x 17'H x 32'D; various non-atomizing spray guns for all lamination

	Ceramic Resin: Viking spray booth, 14.5'W x 9'H x 20'D; various non-atomizing spray guns
Control Equipment:	Six (6) exhaust fans, 12,400 cfm each, with dry filter system, serving gel coat booth; two (2) exhaust fans, 12,500 cfm each, with dry filter system, serving lamination booth; one (1) exhaust fan, 14,400 cfm, serving ceramic resin booth
Identification Number:	P-108-91(a3) , Repair and Re-work Paint Booth
Equipment Description:	19' x 12' x 28' paint spray booth with HVLP gun(s), enclosed gun washer, and one (1) 1 MMBtu/hr natural gas fired heater
Control Equipment:	Four (4) 12,000 CFM exhaust fans with dry filter system. Munters rotor concentrator catalytic oxidizer (RCCO), model #IZS-3546-CT, serving paint booth, and shared with P-23-93(a2). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer.
Identification Number:	P-109-91(a2) , Ledge Area
Equipment Description:	Viking Booth, Dye grinder with diamond abrasive cutting wheel; miscellaneous cutting and grinding equipment
Control Equipment:	Water curtain serving booth with cutting wheel; Auto Vac vacuum and filter system serving cutting and grinding equipment
Identification Number:	P-111-91(a2) , Adhesives Use

Equipment Description: HVLP spray gun for headliner application; various hand application equipment

Control Equipment: None

Identification Number: P-23-93(a2), Main Paint Booth

Equipment Description: 8' x 25' x 116' paint spray booth with HVLP gun(s), enclosed gun washer, one (1) 2 MMBtu/hr natural gas fired heater, and one (1) 1 MMBtu/hr natural gas fired heater

Control Equipment: Four (4) 10,500 cfm each exhaust fans with dry filter system; munters rotor concentrator catalytic oxidizer (RCCO), Model No. IZS-3546-CT, serving the paint booth and shared with P-108-91(a1). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer; dry filter system integral to RCCO

Identification Number: P-34-04, Space Heating

Equipment Description: One Precision Quincy natural gas fired heater, 1 MMBtu/hr, Model #18-60 AMU, Serial #98092

Control Equipment: None

Identification Number: P-35-04, Space Heating

Equipment Description: One Precision Quincy natural gas fired heater, 1 MMBtu/hr, Model #18-60 AMU, Serial #98094

Control Equipment: None

Identification Number: P-36-04, Space Heating

Equipment Description: One Weather Rite natural gas fired heater, 2
MMBtu/hr, Model #TOT-230-HHL, Serial #8263

Control Equipment: None

II. SPECIFIC UNIT REQUIREMENTS

A. Emission Limits and Throughput Limitations

1. For the process operating under P-104-91(a2):
 - a. VOC emissions shall not exceed 577.0 lb/day, 32,901 lb/1st calendar quarter, 33,272 lb/2nd calendar quarter, 33,637 lb/3rd calendar quarter, 33,637 lb/4th calendar quarter, and 51.50 tons/year. [Rule 3.4/C-05-33]
 - b. PM10 emissions shall not exceed 34.6 lb/day, 1,974 lb/1st calendar quarter, 1,996 lb/2nd calendar quarter, 2,018 lb/3rd calendar quarter, 2,018 lb/4th calendar quarter, and 3.09 tons/year. [Rule 3.4/C-05-33]
 - c. The maximum process limits shall not exceed 577.0 lb of VOC/day, 32,901 lb of VOC/1st calendar quarter, 33,272 lb of VOC/2nd calendar quarter, 33,637 lb of VOC/3rd calendar quarter, 33,637 lb of VOC/4th calendar quarter, and 51.50 tons of VOC/year. [Rule 3.4/C-05-33]
2. For the process operating under P-108-91(a3):
 - a. VOC emissions shall not exceed 112.2 lb/day, 6,902 lb/1st calendar quarter, 6,978 lb/2nd calendar quarter, 7,055 lb/3rd calendar quarter, 7,055 lb/4th calendar quarter, and 10.00 tons/year. [Rule 3.4/C-09-143]
 - b. CO emissions shall not exceed 4.8 lb/day, 435 lb/1st calendar quarter, 440lb/2nd calendar quarter, 445 lb/3rd calendar quarter, 445 lb/4th calendar quarter, and 0.88 tons/year. [Rule 3.4/C-09-143]

- c. NOx emissions shall not exceed 5.8 lb/day, 518 lb/1st calendar quarter, 524 lb/2nd calendar quarter, 530 lb/3rd calendar quarter, 530 lb/4th calendar quarter, and 1.05 tons/year. [Rule 3.4/C-09-143]
 - d. SOx emissions shall not exceed 0.0 lb/day, 3 lb/1st calendar quarter, 3 lb/2nd calendar quarter, 3 lb/3rd calendar quarter, 3 lb/4th calendar quarter, and 0.01 tons/year. [Rule 3.4/C-09-143]
 - e. PM10 emissions shall not exceed 5.8 lb/day, 370 lb/1st calendar quarter, 376 lb/2nd calendar quarter, 382 lb/3rd calendar quarter, 382 lb/4th calendar quarter, and 0.75 tons/year. [Rule 3.4/C-09-143]
 - f. The maximum amount of natural gas consumption shall not exceed 0.06 million cubic feet/day, 5.18 million cubic feet/1st calendar quarter, 5.24 million cubic feet/2nd calendar quarter, 5.30 million cubic feet/3rd calendar quarter, 5.30 million cubic feet/4th calendar quarter, and 21.02 million cubic feet/year. [District Rule 3.4/C-09-143]
 - g. The maximum process limits shall not exceed 112 lb of VOC/day, 6,885 lb of VOC/1st calendar quarter, 6,961 lb of VOC/2nd calendar quarter, 7,038 lb of VOC/3rd calendar quarter, 7,038 lb of VOC/4th calendar quarter, and 19,923 lb of VOC/year. [Rule 3.4/C-09-143]
3. For the process operating under P-109-91(a1):
- a. PM10 emissions shall not exceed 28.8 lb/day, 2,592 lb/1st calendar quarter, 2,621 lb/2nd calendar quarter, 2,650 lb/3rd calendar quarter, 2,650 lb/4th calendar quarter, and 5.26 tons/year. [Rule 3.4/C-03-93]
 - b. The maximum operating schedule shall not exceed 24 hr/day, 2,160 hr/1st calendar quarter, 2,184 hr/2nd calendar quarter, 2,208 hr/3rd calendar quarter, 2,208 hr/4th calendar quarter, and 19,923 lb of VOC/year. [Rule 3.4/C-03-93]
4. For the process operating under P-111-91(a2):

- a. VOC emissions shall not exceed 55.0 lb/day, 3,383 lb/1st calendar quarter, 3,421 lb/2nd calendar quarter, 3,458 lb/3rd calendar quarter, 3,458 lb/4th calendar quarter, and 4.90 tons/year. [Rule 3.4/C-04-162]
 - b. PM10 emissions shall not exceed 16.1 lb/day, 987 lb/1st calendar quarter, 999 lb/2nd calendar quarter, 1,009 lb/3rd calendar quarter, 1,009 lb/4th calendar quarter, and 1.43 tons/year. [Rule 3.4/C-04-162]
 - c. The maximum process limits shall not exceed 55 lb of VOC/day, 3,383 lb of VOC/1st calendar quarter, 3,421 lb of VOC/2nd calendar quarter, 3,458 lb of VOC/3rd calendar quarter, 3,458 lb of VOC/4th calendar quarter, and 19,923 lb of VOC/year. [Rule 3.4/C-04-162]
5. For the process operating under P-23-93(a2):
- a. VOC emissions shall not exceed 112.2 lb/day, 6,903 lb/1st calendar quarter, 6,979 lb/2nd calendar quarter, 7,056 lb/3rd calendar quarter, 7,056 lb/4th calendar quarter, and 10.00 tons/year. [Rule 3.4/C-09-144]
 - b. CO emissions shall not exceed 8.9 lb/day, 798 lb/1st calendar quarter, 807 lb/2nd calendar quarter, 816 lb/3rd calendar quarter, 816 lb/4th calendar quarter, and 1.62 tons/year. [Rule 3.4/C-09-144]
 - c. NOx emissions shall not exceed 10.6 lb/day, 950 lb/1st calendar quarter, 961 lb/2nd calendar quarter, 972 lb/3rd calendar quarter, 972 lb/4th calendar quarter, and 1.93 tons/year. [Rule 3.4/C-09-144]
 - d. SOx emissions shall not exceed 0.1 lb/day, 6 lb/1st calendar quarter, 6 lb/2nd calendar quarter, 6 lb/3rd calendar quarter, 6 lb/4th calendar quarter, and 0.01 tons/year. [Rule 3.4/C-09-144]
 - e. PM10 emissions shall not exceed 6.2 lb/day, 403 lb/1st calendar quarter, 409 lb/2nd calendar quarter, 415 lb/3rd calendar quarter, 415 lb/4th calendar quarter, and 0.82 tons/year. [Rule 3.4/C-09-144]

- f. The maximum amount of natural gas consumption shall not exceed 0.11 million cubic feet/day, 9.5 million cubic feet/1st calendar quarter, 9.61 million cubic feet/2nd calendar quarter, 9.72 million cubic feet/3rd calendar quarter, 9.72 million cubic feet/4th calendar quarter, and 38.54 million cubic feet/year. [District Rule 3.4/C-09-144]
 - g. The maximum process limits shall not exceed 112 lb of VOC/day, 6,885 lb of VOC/1st calendar quarter, 6,961 lb of VOC/2nd calendar quarter, 7,038 lb of VOC/3rd calendar quarter, 7,038 lb of VOC/4th calendar quarter, and 19,923 lb of VOC/year. [Rule 3.4/C-09-144]
6. For the process operating under P-34-04:
- a. VOC emissions shall not exceed 0.1 lb/day, 12 lb/1st calendar quarter, 12 lb/2nd calendar quarter, 12 lb/3rd calendar quarter, 12 lb/4th calendar quarter, and 0.02 tons/year. [Rule 3.4/C-03-139]
 - b. CO emissions shall not exceed 2.0 lb/day, 181 lb/1st calendar quarter, 183 lb/2nd calendar quarter, 185 lb/3rd calendar quarter, 185 lb/4th calendar quarter, and 0.37 tons/year. [Rule 3.4/C-03-139]
 - c. NOx emissions shall not exceed 2.4 lb/day, 216 lb/1st calendar quarter, 218 lb/2nd calendar quarter, 221 lb/3rd calendar quarter, 221 lb/4th calendar quarter, and 0.44 tons/year. [Rule 3.4/C-03-139]
 - d. SOx emissions shall not exceed negligible lb/day, 1 lb/1st calendar quarter, 1 lb/2nd calendar quarter, 1 lb/3rd calendar quarter, 1 lb/4th calendar quarter, and negligible tons/year. [Rule 3.4/C-03-139]
 - e. PM10 emissions shall not exceed 0.2 lb/day, 16 lb/1st calendar quarter, 17 lb/2nd calendar quarter, 17 lb/3rd calendar quarter, 17 lb/4th calendar quarter, and 0.03 tons/year. [Rule 3.4/C-03-139]
 - f. The maximum amount of natural gas consumption shall not exceed 24,000 cubic feet/day, 2.16 million cubic feet/1st calendar quarter,

2.18 million cubic feet/2nd calendar quarter, 2.21 million cubic feet/3rd calendar quarter, 2.21 million cubic feet/4th calendar quarter, and 8.76 million cubic feet/year. [District Rule 3.4/C-03-139]

7. For the process operating under P-35-04:

- a. VOC emissions shall not exceed 0.1 lb/day, 12 lb/1st calendar quarter, 12 lb/2nd calendar quarter, 12 lb/3rd calendar quarter, 12 lb/4th calendar quarter, and 0.02 tons/year. [Rule 3.4/C-03-140]
- b. CO emissions shall not exceed 2.0 lb/day, 181 lb/1st calendar quarter, 183 lb/2nd calendar quarter, 185 lb/3rd calendar quarter, 185 lb/4th calendar quarter, and 0.37 tons/year. [Rule 3.4/C-03-140]
- c. NO_x emissions shall not exceed 2.4 lb/day, 216 lb/1st calendar quarter, 218 lb/2nd calendar quarter, 221 lb/3rd calendar quarter, 221 lb/4th calendar quarter, and 0.44 tons/year. [Rule 3.4/C-03-140]
- d. SO_x emissions shall not exceed negligible lb/day, 1 lb/1st calendar quarter, 1 lb/2nd calendar quarter, 1 lb/3rd calendar quarter, 1 lb/4th calendar quarter, and negligible tons/year. [Rule 3.4/C-03-140]
- e. PM₁₀ emissions shall not exceed 0.2 lb/day, 16 lb/1st calendar quarter, 17 lb/2nd calendar quarter, 17 lb/3rd calendar quarter, 17 lb/4th calendar quarter, and 0.03 tons/year. [Rule 3.4/C-03-140]
- f. The maximum amount of natural gas consumption shall not exceed 24,000 cubic feet/day, 2.16 million cubic feet/1st calendar quarter, 2.18 million cubic feet/2nd calendar quarter, 2.21 million cubic feet/3rd calendar quarter, 2.21 million cubic feet/4th calendar quarter, and 8.76 million cubic feet/year. [District Rule 3.4/C-03-140]

8. For the process operating under P-36-04:

- a. VOC emissions shall not exceed 0.3 lb/day, 24 lb/1st calendar quarter, 24 lb/2nd calendar quarter, 24 lb/3rd calendar quarter, 24 lb/4th calendar quarter, and 0.05 tons/year. [Rule 3.4/C-03-141]
 - b. CO emissions shall not exceed 4.0 lb/day, 363 lb/1st calendar quarter, 367 lb/2nd calendar quarter, 371 lb/3rd calendar quarter, 371 lb/4th calendar quarter, and 0.74 tons/year. [Rule 3.4/C-03-141]
 - c. NOx emissions shall not exceed 4.8 lb/day, 432 lb/1st calendar quarter, 437 lb/2nd calendar quarter, 442 lb/3rd calendar quarter, 442 lb/4th calendar quarter, and 0.88 tons/year. [Rule 3.4/C-03-141]
 - d. SOx emissions shall not exceed negligible lb/day, 3 lb/1st calendar quarter, 3 lb/2nd calendar quarter, 3 lb/3rd calendar quarter, 3 lb/4th calendar quarter, and 0.01 tons/year. [Rule 3.4/C-03-141]
 - e. PM10 emissions shall not exceed 0.4 lb/day, 33 lb/1st calendar quarter, 33 lb/2nd calendar quarter, 34 lb/3rd calendar quarter, 34 lb/4th calendar quarter, and 0.07 tons/year. [Rule 3.4/C-03-141]
 - f. The maximum amount of natural gas consumption shall not exceed 48,000 cubic feet/day, 4.32 million cubic feet/1st calendar quarter, 4.37 million cubic feet/2nd calendar quarter, 4.42 million cubic feet/3rd calendar quarter, 4.42 million cubic feet/4th calendar quarter, and 17.52 million cubic feet/year. [District Rule 3.4/C-03-141]
9. For P-104-91(a2) (lamination), the Permit Holder shall not utilize any polyester resin material with a monomer content more than 35 percent by weight. [District Rule 2.30, §301.1]
 10. For P-104-91(a2) (lamination), the Permit Holder shall not utilize any gel coat material with a monomer content more than 35 percent by weight. [District Rule 3.4/ C-04-64]

11. For P-104-91(a2) (lamination), the maximum as-applied VOC-content of solvents used for product cleaning and general maintenance and repair operations shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.1 §402]
12. For P-104-91(a2) (lamination), the Permit Holder shall not discharge into the atmosphere, from the booth stacks, any air contaminant, for a period or periods aggregating to more than three (3) minutes in any one (1) hour which is:[District Rule 3.4/ C-04-64]
 - a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
 - b. Greater than 5% opacity. _____
13. For P-104-91(a2), the Permit Holder shall not release or discharge into the atmosphere, particulate matter in excess of 0.12 grains per cubic foot of exhaust volume as calculated at standard conditions. [District Rule 3.4]
14. For the coating processes and related activities operating under P-23-93(a2) and P-108-91(a3)
 - a. Total coating related VOC emissions for both booths shall not exceed 112 lb/day, 6,885 lb/1st calendar quarter, 6,961 lb/2nd calendar quarter, 7,038 lb/3rd calendar quarter, 7,038 lb/4th calendar quarter, and 9.96 tons/year. [Rule 3.4/C-09-143 and C-09-144]
 - b. Total natural gas fuel consumed for all burners shall not exceed 0.13 million cubic feet/day, 11.66 million cubic feet/1st calendar quarter, 11.79 million cubic feet/2nd calendar quarter, 11.92 million cubic feet/3rd calendar quarter, 11.92 million cubic feet/4th calendar quarter, and 47.30 tons/year. [Rule 3.4/C-09-143 and C-09-144]
15. For the coating processes and related activities operating under P-23-93(a2) and P-108-91(a3), when determining compliance with the daily, quarterly, and yearly permitted process VOC limit, the source shall use the following equation [District Rule 3.4/C-09-143 and C-09-144]:

$$\sum((OB \times OBvoc) + (IB \times IBvoc \times (1-CE/100))) = \text{VOC from coating processes (lbs)}$$

where:

OB = amount of solvent (or other material) used outside booths (gallons)

OBvoc = VOC content of (OB) material used (lb/gallon)

CE = control efficiency of RCCO = 95%

IB = amount of paint (or other material) used inside booth (gallons)

IBvoc = VOC content of (IB) material used (lb/gallon)

16. The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth, as determined by required source testing. [District Rule 3.4/C-09-143 and C-09-144]
17. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the maximum VOC content of solvents used for surface preparation and cleanup including product cleaning, repair and maintenance cleaning and cleaning application equipment, without the use of the RCCO, shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 2.31, §301.1]
18. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall not discharge into the atmosphere, from the control equipment exhaust, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:
 - a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
 - b. Greater than 5% opacity. [District Rule 3.4/C-09-143 and C-09-144]
19. For P-109-91(a1) (ledge processes), the Permit Holder shall not discharge into the atmosphere, from any control equipment, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour, which is:
 - a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
 - b. Greater than 5% opacity. [District Rule 3.4/C-03-93]

20. For P-109-91(a1) (ledge processes), the Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.01 grains per cubic feet of exhaust from the slash booth. [District Rule 3.4/C-03-93]
21. For P-109-91(a1) (ledge processes), the Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.004 grains per cubic feet of exhaust from the vacuum system serving the handheld equipment. [District Rule 3.4/C-03-93]
22. For P-111-91(a2) (adhesives use), the Permit Holder shall not apply any adhesive, sealant, or primer with a VOC content in excess of the following limits: [District Rule 2.33, §301]

TABLE 1. MATERIAL VOC CONTENT LIMITS¹

<u>Category:</u>	VOC Limit g/l (lb/gal)
Adhesives:	
Contact Bond	250 (2.1)
Contact Bond-Specialty Substrates	250 (2.1)
Multipurpose Construction	200 (1.7)
Other Plastic Cement Welding	450 (3.8)
Top & Trim Installation	540 (4.5)
Waterproof Resorcinol	170 (1.4)
Sealants:	
Other Sealants Not Listed	420 (3.5)
Adhesive Primers:	
Automotive Glass	700 (5.8)
Plastic Cement Welding	450 (3.8)
Other Adhesive Primers Not Listed	250 (2.1)
Sealant Primers:	
Other Sealant Primers Not Listed	750 (6.3)

TABLE 2. ADHESIVE SUBSTRATE VOC CONTENT LIMITS¹

Adhesive Application Onto Substrate Type²:	VOC Limit g/l (lb/gal)
Flexible Vinyl	250 (2.1)

Adhesive Application Onto Substrate Type²:	VOC Limit g/l (lb/gal)
Fiberglass	200 (1.7)
Metal to Metal	30 (0.3)
Porous Material	120 (1.0)
Other Substrates Not Listed	250 (2.1)

1. Units in grams of VOC per liter of material (pounds per gallon).

2. If an adhesive is used to bond dissimilar substrates together, the adhesive with the highest VOC content limit shall be allowed.

Conversion factor: 1 pound VOC per gallon = 119.95 grams VOC per liter.

23. For P-111-91(a2) (adhesives use), the maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 3.1, §402 and 2.31]
24. For P-34-04, P-35-04, and P-36-04 (space heating), the Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.01 grains per cubic feet of exhaust. [District Rule 3.4/ C-03-139, C-03-140, C-03-141]

B. Work Practice and Operational Requirements

1. For P-104-91(a2), all VOC -containing materials, whether in its form for intended use or as a waste or used product, including items such as cloth or paper laden with VOC containing materials, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the facility. [District Rule 2.30, §304 and 3.1 §402]
2. For P-104-91(a2) (lamination), only non-atomized spray equipment shall be used for all lamination and gel coat operations at the facility. [District Rule 3.4/C-04-64]
3. For P-104-91(a2) (lamination), all gel coats shall be applied in booth with filters in place and fan operating. [District Rule 3.4/C-04-64]

4. For P-104-91(a2) (lamination), all lamination operations shall be conducted in booth with filters in place and fan operating, where feasible. [District Rule 3.4/C-04-64]
5. For P-104-91(a2) (lamination), the Permit Holder shall utilize lamination booth exhaust filters that are at least 94% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-04-64]
6. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall not apply any coating to any motor vehicle, mobile equipment, or their parts and components unless electrostatic or high volume low pressure (HVLP) application equipment is used. [District Rule 2.26, §304]
7. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC laden materials (including solvent and spent solvent used for surface preparation, cleanup and paint removal). [District Rule 3.4]
8. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall store all VOC-containing materials used in the coating operation (including coatings, catalysts, thinners reducers and solvents, in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4]
9. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall not use organic compounds, with a VOC content greater than 25 g/l, for the cleanup of spray equipment, without the use of the RCCO, unless the spray equipment is disassembled and cleaned in an enclosed gun washer or other low emission washing system that has been demonstrated to be at least equivalent to an enclosed system. [District Rule 3.1 §306 and §307]
10. The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F. [District Rule 3.4/C-09-143 and C-09-144]

11. The catalytic oxidizer shall operate at a minimum temperature of 550° F. [District Rule 3.4/C-09-143 and C-09-144]
12. The pressure differential in the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4/C-09-143 and C-09-144]
13. All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4/C-09-143 and C-09-144]
14. A non-resettable, totalizing gaseous fuel flow meter shall be installed and utilized to measure the quantity (in cubic feet) of natural gas combusted. [District Rule 3.4/C-09-143 and C-09-144]
15. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall utilize booth exhaust filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-09-143 and C-09-144]
16. For P-109-91(a1) (ledge processes), all control equipment shall be operating while the equipment that it serves is in operation. [District Rule 3.4/C-03-93]
17. For P-111-91(a2) (adhesives use), all VOC-containing materials, whether in its form for intended use or as a waste or used product, including items such as cloth or paper laden with VOC containing materials, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the facility. [District Rule 2.33, §304 and 3.1, §402]
18. For P-111-91(a2) (adhesives use), the permit holder shall use one or more of the following methods when applying adhesives: hand application, dip coat, flow coat, brush/roll coat, HVLP spray, LVLP spray, or aerosol cans. In addition, contact bond adhesives that are sprayed may be applied using any

of the following methods: airless spray, air-assisted airless spray, or air-atomized spray. [District Rule 2.33, §304]

19. For P-34-04, P-35-04, and P-36-04 (space heating), the heaters shall be fired on natural gas only. [District Rule 3.4/C-03-139, C-03-140, and C-03-141]
20. The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. [40CFR63 Subpart MMMM]
21. The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. [40CFR63 Subpart PPPP]
22. The Permit Holder shall comply with the National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production on or before April 21, 2006. [40CFR63, Subpart WWWW]

C. Monitoring and Testing Requirements

1. The Permit Holder shall perform a source test at least once every 24 months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4/C-09-143 and C-09-144]
2. The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-09-143 and C-09-144]
3. Ongoing source testing shall be conducted using the following test methods [District Rule 3.4/C-09-143 and C-09-144]:
 - a. Flow Rate - EPA Methods 1 & 2;
 - b. Stack gas oxygen - EPA Method 3A, or CARB Method 100;
 - c. VOC - EPA Method 25 (inlet prior to adsorber and outlet at stack)

4. The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4/C-09-143 and C-09-144]
5. The paint booths must be maintained as Permanent Total Enclosures (PTE), as specified in EPA method 204. The natural draft opening sizes and locations shall be verified and documented during the start up period and shall be verified at least once every 12 calendar months. [District Rule 3.4/C-09-143 and C-09-144]
6. The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day, while the booth is operating, and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 and C-09-144]
7. The Permit Holder shall develop a quality assurance and control practices guideline for operation of the RCCO, prior to issuance of the Permit to Operate. [District Rule 3.1, §402/C-09-143 and C-09-144]

D. Recordkeeping Requirements

1. For P-104-91(a2) (lamination), the Permit Holder shall maintain a current list of VOC containing material used in this operation and the weight percent of VOC in each material. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 2.30, §303.1 & District Rule 3.8, §302.6b]
2. For P-104-91(a2) (lamination), the Permit Holder shall maintain purchase records for the gel coat and lamination booth exhaust filters. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402]
3. The Permit Holder shall maintain a daily log of coating use for P-108-91(a3) and P-23-93(a2) combined. This log shall include coating category, coating name, amount of each coating used, VOC contents as applied for each coating, and corresponding VOC emissions. [District Rule 2.26, §507]

4. For P-108-91(a3) (painting - R&R booth) and P-23-93(a12) (painting - main booth), the Permit Holder shall maintain daily records showing the type, name, and amount of solvent used for cleanup and surface preparation. [District Rule 3.1, §402/C-09-143 and C-09-144]
5. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), the Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 and C-09-144]
6. For P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth), all required records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rule 3.1, §402/C-09-143 and C-09-144]
7. For P-109-91(a1) (ledge processes), the Permit Holder shall maintain quarterly records of hours of operation for the permitted equipment. The log shall be retained for a period of at least five years and shall be made available District personnel upon request. [District Rule 3.1, §402]
8. For P-111-91(a2) (adhesives use), the Permit Holder shall maintain current records listing each adhesive, sealant, primer, stripper, and solvent used at the facility. The records shall include the category type, material name, mix ratio, application method, substrate type, VOC content, and composite partial pressure. [District Rule 2.33, §500]
9. For P-111-91(a2) (adhesives use), the Permit Holder shall maintain daily usage records for adhesives and adhesive related materials and corresponding daily VOC emissions. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402]
10. For P-34-04, P-35-04, and P-36-04 (space heating), the Permit Holder shall maintain quarterly records of natural gas usage. The records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402]

III. FACILITY WIDE REQUIREMENTS

A. Opacity

1. The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:
 - a. As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart as published by the United States Bureau of Mines; or
 - b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

B. Nuisance

1. The permit holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [This permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California State Implementation Plan (SIP). The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only]

C. Circumvention

1. The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of

Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

D. General Permit Requirements

1. No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1 § 301.1]
2. No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1 § 302.1]
3. No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1 § 302.2]
4. The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1 § 405.3]

IV. TITLE V GENERAL REQUIREMENTS

A. Right of Entry

1. The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:
 - a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
 - b. Inspection and duplication of records required by the permit to operate; and
 - c. Source sampling or other monitoring activities. [Rule 3.8 § 302.10]

B. Compliance with Permit Conditions:

1. The permittee shall comply with all Title V permit conditions. [Rule 3.8 § 302.11a]
2. The permit does not convey property rights or exclusive privilege of any sort. [Rule 3.8 § 302.11b]
3. Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [Rule 3.8 § 302.11c]
4. The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [Rule 3.8 § 302.11d]
5. A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [Rule 3.8 § 302.11e]
6. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:
 - a. Compliance with the permit; or
 - b. Whether or not cause exists for a permit or enforcement action. [Rule 3.8 § 302.11f]

C. Emergency Provisions:

1. Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
 - a. An emergency occurred;
 - b. The Permit Holder can identify the cause(s) of the emergency;
 - c. The facility was being properly operated at the time of the emergency;
 - d. All steps were taken to minimize the emissions resulting from the emergency; and
 - e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; andIn any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

D. Severability

1. If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [Rule 3.8 § 302.13]

E. Compliance Certification

1. The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period will begin on the date that the Title V permit is issued (TBD), and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.4 and District Rule 3.8, §302.14(a)]
2. The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice)

and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [Rule 3.8 § 302.14b]

3. The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [Rule 3.8 § 302.14c]
4. The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [Rule 3.8 § 302.14d]

F. Permit Life

1. The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [Rule 3.8 § 302.15]

G. Payment of Fees

1. An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [Rule 3.8 § 302.16]

H. Permit Revision Exemption

1. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

I. Application Requirements

1. An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [Rule 3.8 § 402.2]
2. An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [Rule 3.8 § 402.3]
3. An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:
 - a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
 - b. Proposed permit terms and conditions; and
 - c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [Rule 3.8 § 402.4]

J. Permit Reopening for Cause

1. Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:
 - a. The need to correct a material mistake or inaccurate statement;
 - b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;

- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [Rule 3.8 § 413.1]

K. Recordkeeping

- 1. The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:
 - a. Date, place, and time of sampling;
 - b. Operating conditions at the time of sampling;
 - c. Date, place, and method of analysis; and
 - d. Results of the analysis. [District Rule 3.8, §302.6a]

The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6b]

L. Reporting Requirements

- 1. Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[Rule 3.8 § 302.7a]
- 2. A semi-annual monitoring report shall be submitted at least every six (6) consecutive months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. The six (6) month period will begin on the date that the Title V permit is issued (TBD), and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. [District Rule 3.4 and District 3.8, §302.7(b)]

3. All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [Rule 3.8 § 302.7c]
4. Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [Rule 3.8 § 302.7e]